

ORIGINAL

DMP:CRH/SKW
F. #2020R00147

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.

★ OCT 27 2022 ★

UNITED STATES OF AMERICA

INFORMATION BROOKLYN OFFICE

- against -

Cr. No. 22-CR-471
(T. 18, U.S.C., §§ 1001(a)(1), 1001(a)(2)
and 3551 et seq.)

IBRAHIM ALHUSSAYEN,

Defendant.

-----X

THE UNITED STATES ATTORNEY CHARGES:

**CONCEALING MATERIAL FACTS
AND MAKING FALSE STATEMENTS**

On or about and between June 29, 2021 and January 12, 2022, within the Eastern District of New York and elsewhere, the defendant IBRAHIM ALHUSSAYEN did knowingly and willfully (a) falsify, conceal and cover up by trick, scheme and device one or more material facts, and (b) make one or more materially false, fictitious and fraudulent statements and representations, in a matter within the jurisdiction of the executive branch of the Government of the United States, to wit: the Federal Bureau of Investigation ("FBI"), in that ALHUSSAYEN falsely stated and represented to FBI special agents that he did not control or use one or more pseudonymous social media accounts, when in fact ALHUSSAYEN controlled and operated at least one pseudonymous Instagram account bearing the username "@samar16490," which

ALHUSSAYEN used to, inter alia, threaten and harass dissidents and critics of the Kingdom of Saudi Arabia.

(Title 18, United States Code, Sections 1001(a)(1), 1001(a)(2) and 3551 et seq.)

By Carolyn Pokorny, Assistant U.S. Attorney

BREON PEACE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

No. _____

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

IBRAHIM ALHUSSAYEN,

Defendant.

INFORMATION

(T. 18, U.S.C., §§ 1001(a)(1), 1001(a)(2) and 3551 et seq.)

A true bill.

Foreperson

Filed in open court this _____ day,

of _____ A.D. 20 _____

Clerk

Bail, \$ _____

Craig R. Heeren and Sara K. Winik, Assistant U.S. Attorneys
(718) 254-7000